

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 14, 102, and 104 through 107 are pending, with Claims 104, 106, and 107 being independent. Claims 104 through 107 have been amended.

Claims 14, 102, and 104 through 107 were rejected yet again under 35 U.S.C. § 102 over previously-cited U.S. Patent No. 6,240,555 B1 (Shoff, et al.). All rejections are respectfully traversed.

Claims 104, 106, and 107 recite, *inter alia*, customizing a user layout for displaying the generated plural images and the generated character image in accordance with a user instruction, in combination with registering the user layout which is customized, corresponding to the program ID, and storing a plurality of user layout data, each of which represents a registered user layout by indicating a position of displaying each image, and each of which corresponds to a respective program ID (with synthesizing based on user layout data or basic layout as claimed).

However, Applicants respectfully submit that Shoff, et al. fails to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 104, 106, and 107.

Applicants respectfully submit that Shoff, et al. shows, e.g., that a set-top box (STB) 26 (Fig. 2) or PC 68 (Fig. 4) downloads a video program 40, program information (EPG) 46, and supplemental content 54 from servers 42, 44, and 52 through a network 32 and displays the downloaded data on a monitor; and the supplemental content is downloaded in accordance with a user instruction. The Official Action states that Shoff, et al.'s Fig. 8b corresponds to the claimed "basic layout", and Shoff, et al.'s Fig. 8c, where the

user can operate buttons 212-221, corresponds to the claimed changed layout. Applicants respectfully traverse the Official Action's reliance upon Shoff, et al. since Shoff, et al.'s Fig. 8c does not contain any disclosure or suggestion of the above-discussed claimed features including, *inter alia*, storing a plurality of user layout data, each of which represents a registered user layout by indicating a position of displaying each image, and each of which corresponds to a respective program ID.

It is further respectfully submitted that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

By means of such features, Applicants respectfully submit that a user may, for example, watch a television program *in a layout which corresponds to the program ID* and has been set up by him or her. See, e.g., Fig. 23. Of course, the claims are not limited to the foregoing or to the disclosed embodiments.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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